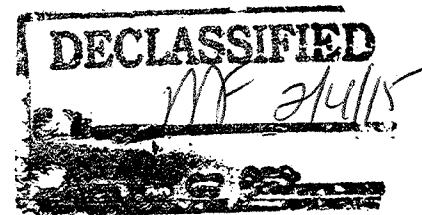


***** Enforcement Confidential *****



Review of PRP Responses to the Gulfco Special Notice Letter
September 30, 2004

Requirement	Chromalloy (response from Strasburger)	Dow (response from Thompson & Knight)	LDL
Good Faith Offer			
Willingness to conduct/finance RI/FS	Willing to negotiate AOC; willing to fund and participate in RI/FS; willing to participate w/ other PRPs & EPA to discuss funding or performance of RI/FS	No commitment; continue discussions w/ EPA on RI/FS; met w/ other PRPs plan removals, investigations, & PRP search	Yes, in conjunction w/ other PRPs; willing to finance & conduct an RI/FS consistent w/ EPA's AOC & SOW
Detailed response to AOC & SOW	None	None, response will be through negotiations (should be ready to begin AOC negotiations by 3/2005)	None
Work plan to proceed with RI/FS	Working w/ Dow to develop a work plan (working to develop an AOC & SOW in compliance w/ CERCLA/NCP/guidance)	Asks that EPA grant more time for PRPs to organize, prepare for, and begin negotiations w/ EPA. Need more time to select a consultant for an RI/FS SOW; should be ready to begin RI/FS negotiations by 3/2005.	Negotiating w/ other PRPs, so not ready to provide a work plan.
Technical capability demonstration	Will select contractors w/ necessary technical expertise.	Both Dow & Sequa have technical expertise. Developing approach for Dow & Sequa to perform the RI/FS w/ funding from sale of LDL's Site.	Expect PRPs will agree on a firm to do work, but until done cannot ID firm
Financial capability demonstration	Chromalloy represents it is	Both Dow & Sequa have financial	LDL's equity in Site



9385803

Requirement	Chromalloy (response from Strasburger)	Dow (response from Thompson & Knight)	LDL
	financially capable; has begun negotiations w/ Dow & LDL to fund RI/FS.	ability. Developing approach where Dow & Sequa would take the financial lead	
Reimburse EPA for oversight	Has begun negotiations w/ Dow & LDL to fund RI/FS; believes other PRPs exist & should share in costs.	Defer until other PRPs identified; wants to discuss cost settlement under EPA orphan share policy.	Yes, for its fairly assigned portion.
PRP contacts	In process of forming a PRP Group	Provided contacts	Provided contact until PRPs decide on a representative
Payment for Past EPA Costs	Not at this time - will negotiate w/ EPA and search for other PRPs)	Defer until other PRPs identified; wants to discuss cost settlement under EPA orphan share policy.	No response
Next Step	Schedule meeting on RI/FS SOW & work plan.	Look forward to EPA's response to Dow's letter	Nothing stated